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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA

v.

YAHAIIRA HEREDIA

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**CRIMINAL COMPLAINT**

Mag. No. 22- 9067

I, Tara Duffy, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Department of Homeland Security – Homeland Security Investigations, and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof.

*Tara Duffy*

\_\_\_\_\_  
Tara Duffy, Special Agent  
Homeland Security Investigations

SA Duffy attested to this Complaint  
by telephone pursuant to FRCP 4.1(b)(2)(A)  
on January 9, 2022 in the District of New Jersey

*Cathy L. Waldor*

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HONORABLE CATHY L. WALDOR  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**Count One  
(Possession with Intent to Distribute Fentanyl)**

On or about January 9, 2022, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

YAHAIIRA HEREDIA,

did knowingly and intentionally possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**ATTACHMENT B**

I, Tara Duffy, am a Special Agent with the United States Department of Homeland Security – Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement has been involved in an investigation into a drug trafficking organization (“DTO”) operating in and around the District of New Jersey. The investigation revealed that YAHAIIRA HEREDIA (“HEREDIA”) is a member of the DTO.

2. On or about January 9, 2022, in Passaic County, New Jersey, law enforcement observed HEREDIA commit certain traffic violations, including changing lanes without signaling, while operating a car (the “Car”) on Route 80.

3. Law enforcement lawfully stopped the Car and obtained lawful consent from HEREDIA to conduct a search of the Car. Law enforcement found, hidden inside the Car’s center console, a secret compartment (the “Trap”). Based on my training and experience, drug traffickers often utilize such hidden compartments within automobiles to conceal narcotics from plain view.

4. After law enforcement discovered the Trap, HEREDIA became visibly nervous and, ultimately, gave law enforcement the sequence, or code, to open it. Inside the Trap, law enforcement found approximately one kilogram of a substance that field tested positive for the presence of fentanyl.

5. HEREDIA was arrested and advised of her rights pursuant to Miranda, which she agreed to waive. HEREDIA subsequently admitted that she was paid \$1,000 to transport what she knew was a controlled substance.